

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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S.D. OF FLA - MIA

Case No. 00-4216-SELTZER

00-11-4216

UNITED STATES OF AMERICA,

Plaintiff,

vs.

SHANNON DAUGHERTY,

Defendant.

GOVERNMENT'S EMERGENCY MOTION TO MODIFY BOND

The United States of America, by and through the undersigned Assistant United States Attorney, files this Emergency Motion to Modify Bond in the above-styled cause. In support thereof, the Government states the following:

1. On September 11, 2000, the defendant, Shannon Gerraughty, had an initial appearance before the Court, wherein the Court set a fifty-thousand dollar (U.S.\$50,000) corporate surety bond with a Nebbia requirement.

2. Upon motion of the defendant, the Court held a hearing on September 14, 2000 to consider modification of the bond previously set by the Court. On that date, the Court modified the amount and type of the bond from a fifty-thousand dollar (U.S.\$50,000) corporate surety bond with a Nebbia requirement to a fifty-thousand dollar (U.S.\$50,000) ten-percent (10%) bond with no Nebbia requirement.

3. The defendant is charged by way of criminal complaint with bank fraud in violation of Title 18, United States Code, Section 1344. Given that probable cause exists to believe that the defendant has committed bank fraud in the case at bar, the Government submits that the defendant (or persons acting at her direction) is (or are) quite capable of committing a similar offense to obtain the money required to post the bond set by the Court.

4. Accordingly, the Government respectfully requests that the Court modify the bond set in the above-styled cause to include a Nebbia requirement.

WHEREFORE, the Government respectfully requests that the Court grant the government's Emergency Motion to Modify Bond.

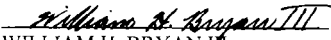
Respectfully submitted,

GUY A. LEWIS
UNITED STATES ATTORNEY

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via facsimile and United States mail this 14th day of September, 2000 to Orlando do Campo, Assistant Federal Public Defender, 150 West Flagler Street, Suite 1700, Miami, Florida 33130-1550.


WILLIAM H. BRYAN III
ASSISTANT U.S. ATTORNEY